

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

COMPANY DOE,
Plaintiff,

v.

INEZ TENENBAUM, Chair of the Consumer
Product Safety Commission; and CONSUMER
PRODUCT SAFETY COMMISSION,
Defendants.

PUBLIC CITIZEN; CONSUMER FEDERATION
OF AMERICA; and CONSUMERS UNION,
Objectors to Seal.

**Civil No. 11-2958
Hon. Alexander Williams, Jr.**

MOTION TO UNSEAL FILINGS REGARDING PLAINTIFF'S MOTION TO SEAL

Public Citizen, Consumer Federation of America, and Consumers Union, who on October 31, 2011 filed written objections to Plaintiff's October 17 Motion To Seal all filings in this case, hereby move this Court to enter an order placing on the public docket all filings in this case regarding the pending Motion To Seal. This category of filings includes but is not limited to (1) any filings supporting or opposing the pending Motion To Seal, (2) any other motions (along with filings in support or opposition) that have been or will be filed seeking to seal or unseal any filings in this case (including but not limited to the instant motion and supporting memorandum), and (3) any orders of this Court that have been or will be filed regarding the October 17 Motion To Seal or any other motions to seal or unseal any filings in this case.

The Motion To Seal was itself unsealed on or before December 2, 2011. The instant motion does not seek to unseal the underlying documents that are the subject of the pending Motion To Seal.

A memorandum in support of this motion and a proposed order accompany this motion.

Dated: December 6, 2011

Respectfully submitted,

/s/ Scott C. Borison
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*Admitted in this case pro hac vice.
Licensed to practice in California.
Practicing in District of Columbia pursuant to D.C.
Ct. App. R. 49(c)(8) while bar application pending.